

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAI'I

STEVEN DE COSTA, in his	)	CIVIL NO. 03-00598 DAE/LEK
representative capacity as	)	
Chairperson of the Board of	)	AFFIDAVIT OF ERIC A. SEITZ;
Trustees of United Public Workers,	)	EXHIBITS 1-7
AFSCME Local 646, AFL-CIO,	)	
Mutual Aid Fund Trust, Real Party	)	
in Interest, United Public Workers,	)	
Local 646, AFL-CIO,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
GARY W. RODRIGUES,	)	
	)	
Defendant.	)	
_____	)	

AFFIDAVIT OF ERIC A. SEITZ

STATE OF HAWAII	)	
	)	SS.
CITY AND COUNTY OF HONOLULU	)	

ERIC A. SEITZ, being first duly sworn on oath, deposes and says:

(1) I am the principal attorney for Defendant Gary W. Rodrigues in the above entitled matter.

(2) Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the Deposition of Dayton Nakanelua taken on October 16, 2007.

(3) Attached hereto as Exhibit 2 is a true and correct copy of a

letter dated May 12, 1994 to Gary Rodrigues from Larry P. Weinberg, General Counsel, AFSME.

(4) Attached hereto as Exhibit 3 is a true and correct copy of the minutes of the Mutual Aid Fund Trustees Meeting on June 21, 1994.

(5) Attached hereto as Exhibit 4 is a true and correct copy of the redacted check in settlement of Plaintiff's lawsuit against Albert Hewitt.

(6) Attached hereto as Exhibit 5 is a true and correct copy of the transcript of the Deposition of Steven DeCosta taken on September 28, 2007.

(7) Attached hereto as Exhibit 6 is a true and correct copy of the transcript of the Deposition of George Yasumoto taken on September 28, 2007.

(8) Attached hereto as Exhibit 7 is a true and correct copy of the transcript of the Deposition of Alison Leong taken on September 28, 2007.

/s/ Eric A. Seitz  
ERIC A. SEITZ

Subscribed and sworn to before me  
this 24th day of October 2007

/s/ Juli T. Seitz  
Notary Public, State of Hawai'i  
My Commission Expires: 1/4/08